

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)

In re:

CIRCUIT CITY STORES, INC.,
et al.

Debtors.

)
)
) Case No. 08-35653 (KRH)
) Chapter 11
) Jointly Administered
)
)

**SWORN DECLARATION AND STATEMENT OF MICHAEL BACH IN SUPPORT OF
CREDITOR GENERAL ELECTRIC, GE CONSUMER & INDUSTRIAL DIVISION**

Pursuant to Debtors' "Second Amended Notice of Debtors' Thirteenth Omnibus
Objection to Certain Amended Claims" (ECF Doc. No. 3720), subsections (c) and (e), Michael
Bach, being duly sworn, deposes and says:

1. I am counsel to General Electric, GE Consumer & Industrial Division
("GE") and, unless otherwise indicated, have personal knowledge of the facts set forth in the
"Preliminary Response of General Electric, GE Consumer & Industrial Division to Debtors'
Thirteenth Omnibus Objection to Certain Amended Claims."

2. On January 28, 2009, I filed GE's initial proof of claim, which was
assigned by the Debtor's agent claim number 9027 ("Claim #9027"), in the amount of
\$28,334,193.54 based on service contracts sold by Circuit City Stores, Inc. (the "Debtor"). Only
\$2,645,318.31 was designated as secured based on a setoff for funds owed to the Debtor for
service work performed by the Debtor under the service contracts.

3. On January 29, 2009, I supervised the filing of GE's amended proof of
claim, which was assigned by the Debtor's agent claim number 7935 ("Claim #7935"), in the
amount of \$28,344,193.54 based on the same service contracts sold by the Debtor. Claim #7935
designated the full amount of \$28,344,193.54 as a secured claim.

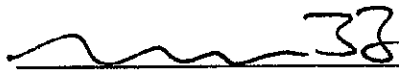
EXHIBIT

A

4. I did not file, nor did I supervise, the filing of proof of claim #10894,
which appears on the Debtor's claims register and is date stamped received February 3, 2009 by
the Debtor's claim agent.

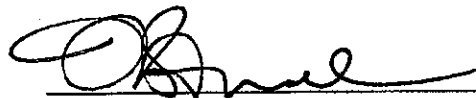
I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14, 2009


Michael Bach

STATE/Commonwealth of: OHIO
CITY/COUNTY OF: HAMILTON

Sworn and subscribed before me in my jurisdiction aforesaid this 14th day of
July, 2009.


Notary Public

My Commission Expires: _____
Notary Registration No.: _____

S0901857



JANET STADERMAN
Notary Public, State of Ohio
My Commission Expires
October 12, 2013